

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

LEGAL COUNSEL

Craig W. Albee, Federal Defender
Krista A. Halla-Valdes, First Assistant

Joseph A. Bugni, Madison Supervisor
John W. Campion
Shelley M. Fite
Anderson M. Gansner
Gabriela A. Leija
Peter R. Moyers
Ronnie V. Murray
Tom E. Phillip
Joshua D. Uller
Kelly A. Welsh

22 East Mifflin Street
Suite 1000
Madison, Wisconsin 53703

Telephone 608-260-9900
Facsimile 608-260-9901

June 5, 2020

Honorable James D. Peterson
United States District Judge
United District Court
120 North Henry Street
Madison, Wisconsin 53703

Re: *United States v. Charles M. Raimondi Sr.*
Case No. 16-cr-88-jdp

Dear Judge Peterson:

I write to update the Court on the defense's efforts since its letter last week (DE 46). It respectfully requests that the Court hold the compassionate release motion in abeyance, or, if it must, deny the request without prejudice to refile.

Given Raimondi's relationship with the KV1, the universe of family members with whom he appropriately could reside is small. (See Presentence Report, Pt. C.) The Court's guidance, set forth in its prior order (DE 44), has narrowed that universe of appropriate residences further still. Yet there remains one lead that the defense believes may adhere to that guidance. And the defense has an investigator assisting in that option's development.

The defense therefore asks that the Court hold the motion in abeyance rather than proceed to rule on any plan that its order makes plain won't be successful. If it must deny the motion, the defense respectfully requests that it deny the motion

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

Honorable James D. Peterson
May 29, 2020
Page -2-

without prejudice to allow for relief in the event the defense can present a plan viable under the guidance in its order.

Sincerely,

/s/ Peter R. Moyers

Peter R. Moyers
Associate Federal Defender